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December 8, 1997

BY MESSENGER

Mr. John J. O'Grady [SR-6J]
Remedial Project Manager
Superfund Division
United States Environmental Protection
Agency -- Region V
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Re: *Vulcan Louisville Smelting Company Site*
CERCLIS I.D. ILD 097 271 563
North Chicago, Illinois

Dear Mr. O'Grady:

In accordance with our agreement of November 6, 1997, I am forwarding on behalf of my client, Fansteel, Inc., a reply to USEPA's letter of June 17, 1997 regarding Fansteel's willingness to perform the identified response activities. Enclosed with this letter is the outline of a Work Plan which has been prepared by Fansteel's environmental consultant, Carlson Environmental, Inc.

If the Agency wishes to discuss any aspect of this proposal, Fansteel and Carlson Environmental personnel are available to do so. Please make arrangements for such discussions by telephone through me.

Very truly yours,

Clifton A. Lake

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Enclosure
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Fansteel, Inc.

Proposed Scope of Work for Vulcan Louisville Smelting Company Site

Fansteel, Inc. proposes to conduct a series of investigations to address the scope of work described in USEPA's June 17, 1997, letter at page 2, paragraphs (a) and (b). Fansteel's proposed investigation is outlined below.

Proposed Intermediate Investigation - Sheet #1

Objective: **To determine whether a plume of VOC-contaminated groundwater is migrating from the Fansteel property toward the Vacant Lot Site.**

Background: Previous investigations included the installation and sampling of three groundwater monitoring wells and numerous soil borings at the Fansteel property for VOCs.

General Scope of Work: Install six monitoring wells. Sample the six newly installed monitoring wells and the three existing monitoring wells for VOCs. Determine the direction of near surface groundwater flow.

Specific Scope of Work: Carlson Environmental, Inc. (CEI) will install six groundwater monitoring wells near the property lines of the Fansteel property. One well will be situated along each of the east and south property lines and the remaining four wells will be located along the west property line. One sample from each of the six new and three existing monitoring wells will be submitted for VOC analysis. CEI will collect static water level measurements and conduct a topographic survey of the well locations in order to determine the direction of near surface groundwater flow across the site.

CEI will follow standard protocol for the collection and analysis of the appropriate duplicate, field and trip blank samples that are typically required by the EPA. All wells will be installed using a drill rig equipped with a hollow-stem auger until the first confining layer (at approximately 40 feet bgs) has been reached. The monitoring wells will be constructed using a 10-foot section of stainless steel well screening materials and completed using PVC risers. Appropriate decontamination procedures will be followed to prevent cross-contamination during sample collection. All auger cuttings and development water will be containerized in 55-gallon drums and appropriate disposal arrangements will be made.

Proposed Intermediate Investigation - Sheet #2

Objective: ***To collect and analyze sediment samples in Pettibone Creek from locations upstream and downstream of the Fansteel outfalls.***

Background: Pettibone Creek runs in a north to south direction through the Vacant Lot Site. Previous sampling of the portion of Pettibone Creek located on the Vacant Lot Site indicates that creek sediments contain elevated concentrations of metals, PCBs, pesticides and PNAs. An active Fansteel outfall #1 discharges to Pettibone Creek at a location under 22nd Street south of the Vacant Lot Site. This active outfall discharges storm water from Fansteel's roof and parking lot collection drains, and non-contact cooling water. Two additional outfalls to the creek are located at the north and south ends of the Vacant Lot Site. The origin of the south outfall (Outfall #2) is unknown. The north outfall (Outfall #3) is an inactive Fansteel outfall which has been sealed.

A ditch which discharges to Pettibone Creek is located northwest of the Vacant Lot Site. An elevated set of railroad tracks and a fenced area containing several electric transformers are located just north of the Vacant Lot Site. Storm and surface waters from a road, the railroad tracks and the fenced area appear to flow into the ditch, and then to Pettibone Creek.

General Scope of Work: Collect six sediment samples for analysis of metals and PCBs. Three samples will be collected within close proximity to and downstream (south) of outfall #2, and three samples will be collected at locations upstream (north) of outfall #3.

Specific Scope of Work: CEI will collect six sediment samples form Pettibone Creek and/or the ditch located north of the Vacant Lot site. Three sampling locations will be north of outfall #3 and three sampling locations will be south of outfall #2 At each discrete sample location, a composite sample will be collected from sediments between zero to two feet below the creek bottom. Each sample will be submitted for analysis of metals (Superfund CLP list) and PCBs.

CEI will follow standard protocol for the collection and analysis of the appropriate duplicate, field and trip blank samples that are typically required by the EPA. All samples will be collected using a hand auger, shovel and/or hand trowel. Appropriate decontamination procedures will be followed to prevent cross-contamination during sample collection.

Proposed Intermediate Investigation - Sheet #3

Objective: **To collect and analyze sediment samples in Pettibone Creek at locations south of the Vacant Lot Site.**

Background: Pettibone Creek runs in an approximate north to south direction through the Vacant Lot Site. Previous sampling of the portion of Pettibone Creek located on the Vacant Lot Site indicates the creek sediments contain elevated concentrations of metals, PCBs, pesticides and PNAs. The water from Pettibone Creek flows south from the Vacant Lot Site and eventually discharges to Lake Michigan. During dredging activities conducted at the Great Lakes Naval Base (downstream of the Vacant Lot Site), elevated metals concentrations were detected in the sediments near Lake Michigan.

General Scope of Work: Collect six sediment samples for the analysis of metals and PCBs. The samples will be collected from Pettibone Creek at locations south of 22nd Street, extending to the property boundary of the Great Lakes Naval Training Center (GLNTC).

Specific Scope of Work: CEI will collect six sediment samples from Pettibone Creek at locations south of 22nd Street extending to GLNTC. At each of the six discrete sample locations, a composite sample will be collected from sediments between zero to two feet below the creek bottom. Each sample will be submitted for analysis of metals (Superfund CLP list) and PCBs.

CEI will follow standard protocol for the collection and analysis of the appropriate duplicate, field and trip blank samples that are typically required by the EPA. All samples will be collected using a hand auger, shovel and/or hand trowel. Appropriate decontamination procedures will be followed to prevent cross-contamination during sample collection.

Rather than immediately preparing an Engineering Evaluation/Cost Analysis (EE/CA), Fansteel, Inc. proposes conducting a series of intermediate investigations. The intermediate investigations' scopes of work will be used to assess whether or not Fansteel, Inc. has been appropriately named as a Potentially Responsible Party (PRP) for the Vacant Lot Site. The results of the intermediate investigations will be evaluated to determine whether or not Fansteel, Inc. should proceed with additional investigations and the preparation of an EE/CA.

In the event that Fansteel, Inc. continues to remain a PRP, the results of the intermediate investigation will be consistent with and support the development of an appropriate scope of work for the additional investigations to adequately characterize the contaminants of concern and define the extent of contamination in order to complete the EE/CA. Fansteel, Inc.'s proposed intermediate investigations are outlined below.